

HONORABLE ROBERT J. BRYAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

MARGARET L. DIBB, SHAUNA OVIST,
SAMANTHA MASON, and WENDY
GONDOS individually, and on behalf of others
similarly situated,

Plaintiffs,

vs.

ALLIANCEONE RECEIVABLES
MANAGEMENT, INC.

Defendant.

NO. 3:14-CV-05835-RJB

**DECLARATION OF MICHAEL
CRAWFORD**

I, Michael Crawford, declare as follows:

1. I am over the age of eighteen. I have personal knowledge regarding the matters discussed herein and am competent to testify regarding the same.

2. I am worked at AllianceOne Receivables Management, Inc. ("AllianceOne") for 15 years. I started working in AllianceOne's IT department in 1999. I am currently the Network/Systems Administrator for AllianceOne Receivables Management, Inc. ("AllianceOne") and oversee AllianceOne's IT department. At a basic level, my job

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1 responsibilities include, among other things, managing the hardware and some aspects of the
2 software for AllianceOne. This includes the peripheral software components that relate to the
3 Columbia Ultimate Business System (CUBS) platform, such as scanned image documents and
4 client interfaces. I have worked with CUBS for 15 years. Because of my job responsibilities and
5 experience, I am personally familiar with the CUBS program, as well as its capabilities,
6 functions, and limitations. I am also familiar and have personal knowledge regarding scanned
7 image documents that are associated with client accounts.

8 3. The CUBS program is similar to the old DOS programs in that it uses machine
9 language. Both utilize what is generally referred to as “machine language” or Terminal Control
10 Language (TCL). There are essentially two ways to search for information in CUBS. There are
11 Recall searches and Easy-Out reports. The difference between the two is that a recall report
12 requires the use of a form of programming. The search requires a string cite and utilization of
13 machine language, TCL. An easy-out report, on the other hand, can obtain similar information
14 in a more “canned” manner; the user basically selects fields for the search rather than inputting
15 specific query language. The issue with both search methods is that they both search and
16 retrieve data that is entered or input into the CUBS database – like names, birthdays, SSNs, or
17 dates. A listing of accounts from the CUBS account database can be obtained and queried
18 against the image database to compile a list of file paths. Additionally these files can then be
19 copied from the current storage location to a secondary location segregating all image documents
20 that belong to the accounts in question. These documents are in PDF format and are 1 page per
21 file. Each image set may contain multiple PDF files and are named in such a way that they do not
22 reference the relevant account number. i.e. 1.pdf, 2.pdf, etc. This would be a full record of the
23 documents with the assumption being they were indexed correctly at the time of scanning to the
24 correct account. To identify and verify any documents that may have been indexed to the wrong
25 category, a manual retrieval of all documents would need to be undertaken. Even if I were able
26

1 to get through an account every 2.4 minutes for eight hours a day, I believe it would take me
2 more than 33 days to retrieve this information from the 6,500 accounts for notices sent between
3 October 2010 and September 2013

4 4. Like most debt collection agencies, AllianceOne utilizes a third-party letter
5 vendor, SourceHOV/Lason. For notices of dishonor sent after September, 2013, the files that
6 AllianceOne's letter vendor provides to AllianceOne are organized by date and are sent in the
7 form of zip files. In order to collect or view the notices and correspondence sent between
8 September, 2013 and present for a particular type of debt (like a dishonored check) or for a
9 particular collector (like the Department of Licensing), I would need to unzip each of the zip
10 files for a given day, which itself can take considerable amount of time depending on various
11 factors. I would then need to search through each of the unzipped files in order to find the
12 requested documents. The files are arranged and labeled numerically (for example, 1.pdf). They
13 are not labeled in a way that allows me to identify, from the file name alone, what the debt is,
14 who the creditor is, who the debtor is, or even what the document is. The documents that are
15 being requested in this case could be in the first zip file from a particular date or they could be in
16 the last zip file. There is no way to tell, except to open each unzipped file. Using CUBS, I was
17 able to approximate the number of accounts that fall into this time frame, which I estimate at
18 approximately 4,500. Because the documents being sought are images, and not character data
19 (for lack of a better term), the recall and easy-out searches are not able to access it. Since I
20 cannot utilize the CUBS searches to view the images, each file needs to be searched manually.
21 Once the requested document is located, I would need to save it as a new document. I am
22 familiar with the CUBS system. If I were able to get through one file in 2.4 minutes for eight
23 hours a day, it would take me a little more than 22 days to search the approx. 4,500 files. I
24 believe it would take someone not familiar with the system more time to go through each file.
25
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1 5. As the systems administrator and the individual that oversees the IT department, I
2 can confidently say that AllianceOne does not currently have the staff to devote to what would
3 amount to a more than 2 month long project of this magnitude. AllianceOne would need to hire
4 a temporary employee in order to accomplish these searches. Based on past experience with
5 temporary employees, I know that this requires a formal written request and advance approval
6 from AllianceOne's CEO and CFO. It will also require time to train the temporary employee in
7 the work procedures that would have to be utilized in order to accomplish these searches as well
8 as AllianceOne's policies. It would also require AllianceOne pay the temporary employee for
9 their work.

10
11 I declare under penalty of perjury under the laws of the State of Washington that the
12 foregoing is true and correct.

13 Dated this 31 day of August, 2015 in Cow Harbor, Washington.

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16 _____
17 Michael Crawford
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